

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, et al.,

Plaintiffs,

-against-

THE PALESTINE LIBERATION
ORGANIZATION and THE PALESTINIAN
AUTHORITY,

Defendants.

Case No.: 18-cv-12355 (MKV)(DCF)

PROOF OF SERVICE

I hereby certify that I am one of the attorneys of record for Defendants in this action and that on August 25, 2021, I caused the attached Notice of Constitutional Challenge to be served via certified mail, tracking number 7018 0040 0000 4788 4270, on the U.S. Attorney General at the following address:

U.S. Department of Justice
Office of the Attorney General
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

/s/ Gassan A. Baloul
Gassan A. Baloul (GB-4473)

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**NOTICE OF CONSTITUTIONAL
CHALLENGE**

Pursuant to Rule 5.1(a)(2) of the Federal Rules of Civil Procedure, Defendants Palestine Liberation Organization and the Palestinian Authority hereby notify the Attorney General of the United States that they have challenged the constitutionality of the Promoting Security and Justice for Victims of Terrorism Act of 2019 (“PSJVTa”) (codified at 18 U.S.C. § 2334(e)), arguing that it cannot be applied to establish personal jurisdiction over them in this case without violating, *inter alia*, the Due Process Clause of the Fifth Amendment to the U.S. Constitution and the separation of powers doctrine. *See* ECF No. 116 at 1-24.

Dated: August 25, 2021

Respectfully submitted,

SQUIRE PATTON BOGGS (US) LLP

/s/ Gassan A. Baloul

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